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Response to Engineering Evaluation Cost Analysis for the former
Lake Ontario Ordnance Works Site (EE/CA)
October 2, 2000

It doesn't take a Master's degree to figure out what is happening with LOOWS, but it does take research skills to determine the players and where the dollars are coming from. Money talks as usual! I will try to explain my concerns.

In my response to Chemical Waste Management's (CWM) SEQRA report, I stated, "What does **Modern**, **CWM**, and **LOOWS** have in common?"

Attachment #1 - CWM SEQRA Response	11/29/00
Attachment #2 - Concerns regarding CWM Requests	2/14/00
Attachment #3 - More concerns	2/28/00
Attachment #4 - Statement regarding Modern Landfill, Inc. requests	5/24/00
Attachment #5 - Responses to Judith S. Leithner re my April 12, 2000 concerns	9/20/00

Comments:

1. Is it not coincidental that CWM Balmer Rd. Site is part of the Eastern Area of CWM that they (CWM) wants to change from general industrial (M2) to heavy industrial (M3) and expand the landfill vertically and horizontally!

2. CWM (Balmer Rd. Site) started in '98 - stopped in '99 for lack of funds. Original project to have cost over \$2.1 million, but present alternative to cost \$1,741,000.

3. **I would have chosen Alternative #5, but then that was the cost of the original proposal! (Note prior comments on landfills and you understand my concern).**

4. Twelve Mile Creek will need to be rerouted in order for CWM to expand outward. What have previous studies indicated when we start fooling with Mother Nature and ecological systems!

5. We are currently in an era of advanced technology (See attachment #4) but we continue with a "TWABAL" (There Will Always Be A Landfill) mentality. We are only making a dent in our waste problem by reducing, recycling, and reusing but it is a positive start and should be an encouraged trend.

We are perpetuating "TWABAL" by allowing CWM and Modern to extend leases and expand. Don't you agree!

6. p.13 EE/CA (Not numbered in my copy!) start p.12 "In 1969, the Somerset Group (Somerset) obtained an approximately 100-acre section of the (p.13) former LOOW property that contained AFB-68. Around 1979, the southern half of the former AFB-68 (about 50 acres) was sold to SCA. This section is currently owned by CWM, (CWM operates the site as a Resource Conservation and Recovery Act (RCRA)

TSDE. "

p.7 EE/CA "Based upon analytical results, Resource Conservation and Recovery Act (RCRA) hazardous wastes would be disposed to a commercial treatment, storage, and disposal facility (TSDF) permitted to accept RCRA wastes. Excavated soils would either be returned to the excavation if "clean" or disposed to a properly permitted commercial landfill if "contaminated". **That's CWM folks.**

read on! p. 20 EE/CA 2.2.2 Private, Public, Municipal and Federal (Non-DOD) Operations on LOOW: ..."Based on information obtained to date, most of the possible impacts from DOD-related activities on private, public, or municipal operations appear to be confined to the approximate 1,500 acre south of Balmer Road, formerly owned by the USAEC/DOE. Private corporations or municipalities own this area, with the exception of the 191-acre NFSS and 98-acre USAF parcel (former YTA)." ...**"These include CWM, Modern Disposal Services, Inc. (including former Department of Labor (DOL) property), and the Town of Lewiston. ...Lew-Port Schools."**

Read p. 21 for more information on Modern Landfill - "125.57-acres were subsequently owned by the DOL for a training site, then sold to Modern Disposal Services, Inc., in **1988**".

Is it coincidental that CWM and Modern (both waste facilities) request to go upward and outward and remain for another 40 to 50 years!!

Isn't their(CWM/Modern) location advantageous to the Federal Government with their carry-over problem!!

In Reference to comment #3, Why I prefer Alternative # 5:

1. It does not rely on land-disposal of hazardous wastes in a RCRA permitted landfill untreated.

p. 72 EE/CA 6.6.1 Effectiveness: -Reduction Of Potential Risks To Human Health And The Environment: "Chemical treatment would likely offer more long-term effectiveness than land disposal or stabilization."

After 50 years of "baby-sitting" this as Tim Henderson stated, our community deserves the best method possible.

Alternative #2 is not the most expensive method, it is not the most effective, but it is probably the least complicated.

Western N.Y. deserves a break - we have had our share and more of wastes and landfills. Western N.Y. has done their part for the State and Federal government and now let someone else share that responsibility.

I request Alternative #5 be reconsidered and CWM and Modern requests for expansion/extensions be denied.

In conclusion:

It is convenient for the Federal government that CWM just happens to have a RCRA TSDF facility. All that is being done in Alternative #2 is sampling, analyzing, and disposing in the same area. Yes, I agree with you that it is a "unique situation", but it is not in the best interest of the citizenry.

It is a documented fact that all landfills leak. There has been a higher 'than average rate of different cancers, MS, Asthma, etc in Niagara County. We cannot afford the time and money it would take to do a comprehensive study, but just ask any physician in Niagara County to verify this.

Yes, I have a personal interest in this whole scenario. I have personal friends and relatives that have or had cancer. My son was diagnosed with MS with no family history, but he has spent a lot of time in this disputed area. MS is one of those diseases for which they have found no cure and it is a nerve disease.

World War II brought with it the development of many chemical compounds. Since then we have dealt with residuals from these of DDT and TNT to name just two. Use of these two chemical combinations are known to cause tumors, pancreatitis, and nerve dysfunctions.

I will end with this statement taken from a previous Lewiston-Porter chemistry text, Chemicals in Action 1987, p. 313 Debate the nuclear issue - "Our ancestors generated long-term effects on our environment and today we continue to do the same thing. What we have that our ancestors did not have is the ability to predict the long-term effects of our actions."

Submitted by
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cc: U.S. Army Corps of Engineers
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